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Attorney for Carrie Lynn Simons

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARRIE LYNN SIMONS,

Defendant.

NO. 3:18-CR-00628-HZ

DECLARATION IN SUPPORT OF
JOINT MOTION TO CONTINUE
SENTENCING DATE

I Benjamin Kim, declare:

1) I am the attorney for defendant appointed pursuant to the Criminal

Justice Act.

2) I was appointed on April 4, 2019.

3) Ms. Simon is currently on release and not in custody.

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1 4) Ms. Simon entered a plea in this matter on March 13, 2020.

2 5) Sentencing in this matter is currently set for May 4, 2021.

3 6) This matter has been continued several times at the request of the
4 defendant for identical reasons.

5 7) The parties need additional time to resolve issues necessary to address at
6 sentencing.

7 8) I have discussed the continuance with the government and the
8 government joins in this motion.

9 9) I have discussed the continuance with Ms. Simons and she agrees and
10 consents to this request for continuance.
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13 Dated March 23, 2021

/s/Benjamin B. Kim

14 Benjamin B. Kim

15 Attorney for Defendant
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